## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

ANTHONY KNEISSER,

Plaintiff.

v.

THE HONORABLE DENNIS P. MCINERNEY, et al.,

Defendants.

Civil Action No.: 15-7043 (NLH/ AMD)

**JURY TRIAL DEMANDED** 

PLAINTIFF'S MOTION FOR LEAVE
TO FILE AN AMENDED
COMPLAINT PURSUANT TO FED.
R. CIV. P. 15(c)

TO:

Clerk of the Court
United States District Court
District of New Jersey
Mitchell H. Cohen Building & U.S.
Courthouse
4<sup>th</sup> & Cooper Streets
Room 1050
Camden, NJ 08101

David M. Serlin, Esq. Blason II, Suite 120 505 South Lenola Road Moorestown, New Jersey 08057

John L. Slimm, Esq. Marshall, Dennehey, Warner, Coleman & Goggin 15000 Midlantic Drive, Suite 200 P.O. Box 5429, Mt. Laurel, NJ 08054

## PLAINTIFF'S MOTION FOR LEAVE TO FILE AN AMENDED COMPLAINT PURSUANT TO FED. R. CIV. P. 15(c)

Plaintiff Anthony Kneisser, by and through his attorneys, respectfully moves the Court, pursuant to Rules 15(c) and 19(a) of the Federal Rules of Civil Procedure, for leave to file a FIRST AMENDED COMPLAINT to identify a party that had been previously identified as "John Doe 1." A redlined copy of the proposed amended complaint is attached hereto. As explained more thoroughly in attached memorandum of law in support of this motion:

1. Plaintiff in his original complaint named "John Doe" defendants 1-10.

2. Since the filing of the complaint, Plaintiff has determined that the name of defendant "John Doe 1" is Rosa Henry.

Dated: May 10, 2017

Alexi M. Velez, Esq

## AMERICAN CIVIL LIBERTIES UNION OF NEW JERSEY FOUNDATION

Edward Barocas Jeanne LoCicero Alexander Shalom Alexi M. Velez 89 Market Street, 7th Floor P.O. Box 32159 Newark, NJ 07102

Telephone: (973) 854-1715 Facsimile: (973) 642-6523

## CARLUCCIO, LEONE, DIMON, DOYLE & SACKS, LLC

Marguerite Kneisser 9 Robbins Street Toms River, NJ 08753 Tel: (732) 797-1600 ext. 223 Facsimile: (732) 797-1690

Counsel for Plaintiff